UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X
THE EXPORT-IMPORT BANK OF THE REPUBLIC OF CHINA,	: : : 13 Civ. 1450 (HB)
Plaintiff/Judgment Creditor,	:
- against -	:
GRENADA,	:
Defendant/Judgment Debtor.	:
	X

## NOTICE OF MOTION FOR JUDGMENT ON THE PLEADINGS DISMISSING PLAINTIFF'S COMPLAINT

PLEASE TAKE NOTICE that upon the declaration of Boaz S. Morag, dated April 17, 2013, all attached exhibits, the accompanying Memorandum of Law and all prior pleadings and papers filed in this action, defendant Grenada will move this Court, at a date and time to be determined by this Court, pursuant to Federal Rule of Civil Procedure 12(c), for an order granting judgment on the pleadings dismissing plaintiff The Export-Import Bank of the Republic of China's Complaint with prejudice, and for such other relief as this Court deems just and proper.

NOTICE IS FURTHER GIVEN that plaintiff's response to the Motion shall be filed on or before May 1, 2013, or such later date as may be agreed to by the parties and approved by the Court.

Dated: New York, New York April 17, 2013

## CLEARY GOTTLIEB STEEN & HAMILTON LLP

By: /s/ Boaz S. Morag
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